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ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROBERT E. BROCK JR.; AMANDA BO
DENTON; JEFFERY LAO; KAMAL
DAYEKH; WILSON WOO; CHRISTOPHER
MONTTOYA; FRANCISCO UBALDO;
JAMAL M. KHAN, CHRISTOPHER M.
NAVARRO; and other Similarly Situated
Employees; TERESA M. BROCK; WISSAM
HALHOUL; and DOES 1-200,

Plaintiffs,

vs.

CONCORD AUTOMOBILE DEALERSHIP,
LLC DBA: LEXUS OF CONCORD, LLC;
TOYOTA MOTOR SALES U.S.A, INC;
HANK TORIAN, *In His Individual Capacity*;
PATRICK MILIANO; GREG JAMES; and
DOES 1-200,

Defendants.

Case No.: 14-cv-01889-HSG

PLAINTIFFS' REQUEST TO APPEAR BY
TELEPHONE TO THE APRIL 23, 2015
HEARING ON DEFENDANTS' MOTIONS
TO DISMISS PLAINTIFFS SECOND
AMENDED COMPLAINT

DATE: April 23, 2015

TIME: 2:00 PM

DEPT: Courtroom 15, 18th Floor

PLAINTIFFS, through their counsel, CHARLES A. BONNER, ESQ. and A. CABRAL
BONNER ESQ. hereby request an order to allow Plaintiffs to appear by telephone at the APRIL
23, 2015 HEARING ON DEFENDANTS' MOTIONS TO DISMISS PLAINTIFFS SECOND
AMENDED COMPLAINT. This request incorporates, as though fully set forth herein, the

1 Declaration of A. Cabral Bonner in support of order allowing a telephonic appearance included
2 below.

3 Good cause is present given that plaintiffs' counsel are in trial in the case of *Valdez, et al.*
4 *vs. Salinas Valley Memorial Hospital, et al.*, Monterey County Superior No.: M 102561.

5 Dated: April 21, 2015

RESPECTFULLY SUBMITTED
LAW OFFICES OF BONNER & BONNER

7 By: /s/ A. Cabral Bonner
8 A. CABRAL BONNER,
9 Attorney for Defendants

1 DECLARATION OF A. CABRAL BONNER IN SUPPORT OF ORDER ALLOWING
2 PLAINTIFFS TO APPEAR BY TELEPHONE TO THE APRIL 23, 2015 HEARING ON
DEFENDANTS' MOTIONS TO DISMISS PLAINTIFFS SECOND AMENDED COMPLAINT

3 I, A. CABRAL BONNER, declare as follows:

- 4 1. I am an attorney duly licensed by the State of California duly to practice law before all
5 courts in the State of California including the United States District Court for the
6 Northern District of California.
- 7 2. My Business address is 475 GATE FIVE ROAD, SUITE 212, SAUSALITO, CA 94965.
8 I have personal knowledge of the matters set forth herein, except those stated on
9 information and belief. If called as a witness I could competently testify thereto.
- 10 3. Our office consists of only two attorneys, Charles A. Bonner and A. Cabral Bonner.
11 Both attorneys are currently in trial in Monterey County in the matter *Valdez, et al. vs.*
12 *Salinas Valley Memorial Hospital, et al.*, Monterey County Superior No.: M 102561.
- 13 4. The Valdez trial is currently set to continue through Thursday April 23, 2015 and we will
14 be unable to drive to District Court prior to the 2 pm court appearance. A. Cabral
15 Bonner will be able to make a telephone appearance from Monterey.

16 I declare under the penalty of perjury under the laws of the United State of America and the
17 State of California that the foregoing is true and correct, except as to those matters stated on
18 information and belief, and as to those matters, I believe them to be true.

19 This declaration was executed on April 21, 2015at Sausalito, California.

20 By: /s/ A. Cabral Bonner
21 A. CABRAL BONNER,
22 Attorney for Plaintiff
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ORDER

IT IS SO ORDERED:

Good cause showing, Plaintiffs may appear at the APRIL 23, 2015 Hearing on Defendants' Motion to Dismiss Plaintiffs' Second Amended Complaint telephonically. Counsel shall contact CourtCall at (866) 582-6878 to make arrangements for the telephonic appearance.

Dated: 4/21/2015


DISTRICT COURT JUDGE